United States Attorney Southern District of New York

86 Chambers Street New York, New York 10007

February 4, 2019

VIA ECF

The Honorable Stuart M. Bernstein United States Bankruptcy Judge United States Bankruptcy Court One Bowling Green New York, New York 10004

In re: Durr Mechanical Construction, Inc., No. 18-13968 (SMB)

Dear Judge Bernstein:

This Office represents the United States of America, on behalf of the Internal Revenue Service ("IRS"), in the above-referenced Chapter 11 case. In accordance with Your Honor's rules, I write to request an extension of the IRS's deadline to file an objection to Debtor's motion seeking entry of a final order authorizing Debtor's use of cash collateral and adequate protection to secured creditors (Dkt. No. 115), which is scheduled for a hearing on February 12, 2019 at 10:00 a.m. Debtor and the IRS are in the process of negotiating a stipulation and proposed order, which may obviate the need for the IRS to file an objection to Debtor's motion. Accordingly, in the interest of avoiding unnecessary briefing and in an effort to reach an amicable resolution, the Government respectfully requests an extension of three days, to February 8, 2019, to file any objection to Debtor's motion. Debtor consents to this request.

We thank the Court for its attention to this matter.

Respectfully submitted,

GEOFFREY S. BERMAN United States Attorney for the Southern District of New York

By: /s/ Rachael L. Doud
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